

1 Rene L. Valladares  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
4 \*Laura Barrera  
5 Assistant Federal Public Defender  
6 Michigan State Bar No. P80957  
7 411 E. Bonneville Ave., Ste. 250  
8 Las Vegas, Nevada 89101  
9 (702) 388-6577  
10 Laura\_Barrera@fd.org

\*Attorney for Petitioner Paul Santiago

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 Paul Santiago,

14 Petitioner,

15 v.

16 State of Nevada,

17 Respondent.

Case No. 2:21-cv-00896-APG-NJK

**Unopposed motion for extension of  
time in which to file Reply to  
Answer**

**(First request)**

18 Petitioner Paul Santiago respectfully moves this Court for an extension of time  
19 of 90 days, from February 9, 2024, to and including May 9, 2024, in which to file his  
20 Reply to the Answer.  
21  
22  
23  
24  
25  
26

**POINTS AND AUTHORITIES**

Mr. Santiago filed a *pro se* petition for writ of habeas corpus on or about May 4, 2021.<sup>1</sup> Counsel filed a First Amended Protective Petition on August 18, 2021.<sup>2</sup> Counsel simultaneously sought leave to file a Second Amended Petition, which the Court granted.<sup>3</sup> Mr. Santiago filed his Second Amended Petition on July 13, 2022.<sup>4</sup> Respondents filed their Motion to Dismiss on January 27, 2023.<sup>5</sup> Mr. Santiago filed his Opposition to the Motion to Dismiss on May 25, 2023.<sup>6</sup> This Court issued its order on the Motion on September 25, 2023.<sup>7</sup> The Court then dismissed Ground One on October 23, 2023, and ordered Respondents to answer the remaining claims.<sup>8</sup> Respondents filed their Answer on December 11, 2023.<sup>9</sup> Mr. Santiago now requests additional time to file his Reply. This is the first request for an extension of time. The additional period of time is necessary in order to effectively represent Mr. Santiago. This motion is filed in the interests of justice and not for the purpose of unnecessary delay.

Undersigned counsel respectfully requests additional time to prepare the Reply because counsel returned from maternity leave three days ago, on February 6, 2024. Counsel's leave began in October, before Respondents filed their Answer. Therefore, undersigned counsel requires additional time to review the Answer and prepare the Reply.

---

<sup>1</sup> ECF No. 1-1 at 1.

<sup>2</sup> ECF No. 11.

<sup>3</sup> ECF No. 13.

<sup>4</sup> ECF No. 27.

<sup>5</sup> ECF No. 67.

<sup>6</sup> ECF No. 73.

<sup>7</sup> ECF No. 77.

<sup>8</sup> ECF No. 79.

<sup>9</sup> ECF No. 83.

1 On February 9, 2024, counsel for Respondents, Deputy Attorney General Adam  
2 Woodrum, indicated by email that Respondents do not oppose this request with the  
3 understanding that Respondents' lack of objection is not a waiver of any procedural  
4 defenses.

5 For the above stated reasons, Mr. Santiago respectfully requests this Court  
6 grant an extension of time of 90 days and order the Reply to be filed on or before May  
7 9, 2024.

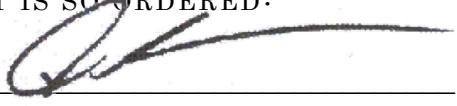
8 Dated February 9, 2024.

9 Respectfully submitted,

10 Rene L. Valladares  
11 Federal Public Defender

12 /s/ Laura Barrera  
13 Laura Barrera  
14 Assistant Federal Public Defender

15  
16 IT IS SO ORDERED:

17   
18 \_\_\_\_\_  
19 United States District Judge

20 Dated: February 12, 2024  
21  
22  
23  
24  
25  
26